INTERNATIONAL COUNCIL
OF CRUISE LINES

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May 9, 2002

Ms. Marlene Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Procedures to Govern the Use of Satellite Earth Stations on Board Vessels in Bands Shared With Terrestrial Fixed Service -- IB Docket No. 02-10

Dear Ms. Dortch:

The International Council of Cruise Lines ("ICCL") is writing in response to the Federal Communications Commission's request for comments on the authorization of satellite earth stations onboard vessels ("ESVs"). The ICCL is a non-profit trade association that represents the interests of 16 passenger cruise lines operating worldwide, and provides partnership opportunities with more than 70 cruise industry businesses and suppliers. We participate in the regulatory and policy development process both in the United States and abroad for the purpose of ensuring that all measures adopted provide for a safe, secure, and more pleasurable cruise ship environment.

In our view, establishing a regulatory regime that ensures the continued operations of ESVs should be a Commission priority. For more than a decade, ESVs have provided cruise line operators and their passengers with a reliable and affordable means of sending and receiving data, voice and video transmissions. No other means of communication is able to offer the services like those of ESVs. Thus, as it considers the issues relating to ESV authorization, the ICCL urges the Commission to adopt regulations that do not unduly undermine or limit the existing operations of ESVs.

ESVs today provide a wide range of services that satisfy the demands of a sizeable market – namely, the more than 200,000 passengers and crewmembers onboard ESV-equipped cruise ships at any given time. Cruise line passengers, in particular, have come to expect certain services as part of their sailing experience. For instance, it is now routine for passengers to access the public switched telephone network while vacationing at sea or stay in touch with those at home via facsimile or e-mail messaging. ESVs make such communications possible. ESVs also enable cruise line operators to offer Internet

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cafes, a popular service that allows passengers and crew members to "surf" while on the high seas, and use of automated teller machines, which provide ready cash to those onboard.

ESVs directly benefit cruise line operators "behind the scenes" as well. The broadband capabilities of ESV satellite networks permit the transfer of tremendous amounts of data in a short amount of time. For example, this capability allows cruise line operators to process registration, Customs and Immigration data for up to 3,000 passengers per ship in four to five hours. This is a remarkable accomplishment that saves cruise line operators money, eases the burdens placed on Customs and Immigrations Officials, and lessens the delays experienced by passengers. This service significantly adds to the security of this country-a task that is part of all of our lives. ESVs also streamline numerous administrative functions, such as inventory management and passenger cabin assignments, by allowing staff aboard a cruise ship to communicate directly with home office operations on-shore. If a passenger wishes to make a purchase in a cruise ship gift shop, ESVs enable the real-time verification of the passenger's credit card. ESVs also make possible the real-time tracking of cruise ships using GPS technology and access to up-to-date weather information and other data critical to the safety and security of life at sea.

The ICCL stresses that the services provided by ESVs are not available through any other means. INMARSAT, in particular, lacks the bandwidth necessary to support many broadband services, and otherwise cannot compete with ESVs on a cost basis. The absence of a viable alternative to ESVs underscores the critical need to allow ESVs to continue to operate as they do today.

The ICCL supports the Commission's efforts to provide a more stable regulatory environment for ESVs. Stability, however, must not come at the expense of denying cruise line operators and their passengers the many benefits that they have come to expect from ESVs, and which ESVs alone can provide. Accordingly, the ICCL urges the Commission to establish a regulatory regime that allows existing and essential ESV services to continue.

Respectfully submitted,

J. Michael Crye
President